

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>John Hancock Life Insurance Company</b>	)	
<b>(U.S.A.) f/k/a Manufacturers</b>	)	
<b>Life Insurance Company,</b>	)	
	)	<b>Civil Action 4:18-cv-02869</b>
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>The Estate of Jennifer Lauren Wheatley</b>	)	
<b>c/o Louis A. Wheatley, et al.</b>	)	
	)	
<b>Defendants.</b>	)	

**OFFER OF JUDGMENT**  
**PURSUANT TO RULE 68 OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Plaintiff John Hancock Life Insurance Company (U.S.A.) f/k/a Manufacturers Life Insurance Company (“John Hancock”) submits the following offer of judgment to Defendant The Estate of Jennifer Lauren Wheatley (the “Wheatley Estate”) pursuant to Federal Rule of Civil Procedure 68. Judgment may be had by the Wheatley Estate against John Hancock in the amount of \$25,000.00, as a full and final satisfaction of all counterclaims asserted by the Wheatley Estate in this case, including prejudgment interest and all claims for costs accrued as of the date of this offer of judgment.

In accordance with Rule 68, this Offer of Judgment shall be deemed withdrawn if it is not accepted within fourteen days of service and shall not be admissible except in a proceeding to determine costs and reasonable attorney fees. This Offer of Judgment is made solely for the purposes of Rule 68 and is not an admission of liability by John Hancock.

**ACCEPTED BY:**

THE ESTATE OF JENNIFER LAUREN  
WHEATLEY

By: \_\_\_\_\_

Date: \_\_\_\_\_

**BRYAN CAVE LEIGHTON PAISNER LLP**

By: /s/ Gregory J. Sachnik

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*Attorneys for Plaintiff John Hancock Life  
Insurance Company (U.S.A.)*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 30, 2020, the foregoing was served via electronic mail to all counsel of record.

/s/ Gregory J. Sachnik

Attorney for Plaintiff